

# EXHIBIT G

IN THE DISTRICT COURT OF SEMINOLE COUNTY  
STATE OF OKLAHOMA

LUTHER WILLIAMS, JR. and  
CONNIE FAY WILLIAMS,  
husband and wife,

Plaintiffs,

vs.

SEMINOLE HEALTH CENTER, L.L.C.  
d/b/a SEMINOLE MEDICAL CENTER;  
HUSSEIN TORBATI, P.A.C.;  
HARRY CHAYNE FISHER, D.O., and  
JEFFREY L. WATTS, M.D.,

Defendants.

No. S-CJ-2008-47

**AMENDED PETITION**

Plaintiffs, for causes of action against Defendants, state:

**First Cause of Action**

Plaintiff Luther Williams, Jr., for this First Cause of Action, alleges and states:

1. Plaintiffs are residents of Pottawatomie County, Oklahoma. One or more of the Defendants can be served in Seminole County. The Court has jurisdiction and venue.
2. On June 27, 2006, Plaintiff Luther Williams, Jr., presented as a patient at the Emergency Room at Seminole Medical Center and was examined and treated by Hussein Torbati, P.A.C. A chest x-ray was ordered by Hussein Torbati, P.A.C. and was later performed at the Seminole Medical Center on June 27, 2006. Thereafter, Plaintiff Luther Williams, Jr. was discharged from Seminole Medical Center and from that point on was no longer a patient of or at the Seminole Medical Center.

The x-ray was later interpreted by Jeffrey L. Watts, M.D. who reported on or after June 28, 2006, that an underlying lung mass could not be excluded and therefore, a chest CT was recommended. This report by Jeffrey L. Watts, M.D. was communicated to Seminole Medical Center.

The recommendation contained in the x-ray report prepared by Jeffrey L. Watts, M.D. was never brought to the attention of Plaintiff Luther Williams, Jr. This failure to bring this recommendation to Plaintiff's attention constitutes general negligence by Defendant Seminole Health Center, L.L.C. d/b/a Seminole Medical Center and further constitutes medical negligence by Defendants Hussein Torbati, P.A.C.; Harry Chayne Fisher, D.O., and Jeffrey L. Watts, M.D.

At all times pertinent hereto, Seminole Medical Center acted by and through its agents, servants and employees including, but not limited to, nurses, technicians, clerks, administrators, Hussein Torbati, P.A.C., and Harry Chayne Fisher, D.O. Further, Plaintiff alleges that on June 27, 2006, Harry Chayne Fisher, D.O. was the supervising physician for Hussein Torbati, P.A.C., and as such, Hussein Torbati acted as the agent, servant and employee of Harry Chayne Fisher, D.O.

3. In April 2007, Luther Williams, Jr. reported to physicians that he was spitting up blood and later diagnostic testing confirmed that he had lung cancer although additional testing reflected that the cancer had not metastasized to the brain. Then, subsequent to these events and particularly in April 2008, additional radiographic testing has now confirmed that Plaintiff has cancer of the brain and Plaintiff alleges that his lung cancer has, in fact, metastasized to his brain.

4. As the result of the negligence of the Defendants, Plaintiff Luther Williams, Jr. has sustained injury and damages. His damages exceed Ten Thousand Dollars (\$10,000.00).

WHEREFORE, Plaintiff Luther Williams, Jr. prays damages against Defendants in a sum exceeding Ten Thousand Dollars (\$10,000.00), interest and costs.

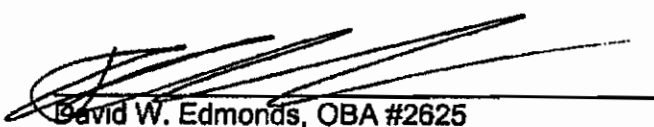
**Second Cause of Action**

For this Second Cause of Action against Defendants, Plaintiff Connie Fay Williams adopts paragraphs 1 through 4 of the First Cause of Action and further alleges and states:

1. Connie Fay Williams is the spouse of Plaintiff Luther Williams, Jr. As a result of the negligence of the Defendants and the resulting bodily injuries to Luther Williams, Jr., Plaintiff Connie Fay Williams has sustained damages in a sum exceeding Ten Thousand Dollars (\$10,000.00).

WHEREFORE, on the Second Cause of Action, Plaintiff Connie Fay Williams claims damages in a sum exceeding Ten Thousand Dollars (\$10,000.00), interest and costs.

ATTORNEYS LIEN CLAIMED  
JURY TRIAL DEMANDED



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**CERTIFICATE OF SERVICE**

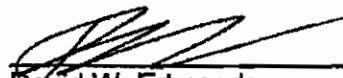
The undersigned certifies that a true and correct copy of the above and foregoing was mailed, postage prepaid, this 20<sup>th</sup> day of May, 2009, to:

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